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June 26, 2024

VIA ECF

Hon. Brian M. Cogan
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Epifania Nunez v. Jay Zed LLC, Broklive Management LLC, Jason Vorchheim,
Smyth Law P.C., Christina Smyth and Christina Willilams*
Docket No.: 1:24-cv-03949-BMC

Dear Judge Cogan:

Our firm has just been retained to represent Defendants Smyth Law P.C. and Christina Smyth in the above referenced matter. Pursuant to your individual rules, this letter application is being made to request an extension of time to put in an answer or motion to dismiss the Complaint from July 2, 2024 until July 19, 2024. We are requesting this extension of time so that we have sufficient time to discuss the claims with our clients and to undertake the due diligence necessary to file the appropriate responsive pleading. This is our first request for an extension of time. We have conferred with Plaintiff's counsel and they do not oppose this request.

We thank you for your time and consideration.

Respectfully submitted,

RIVKIN RADLER LLP

Kenneth A. Novikoff

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4866-2061-3580, v. 1